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Proposed Attorneys for Debtors and Debtors-in-Possession

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11

GLOBAL CONTAINER LINES LTD., et al.,

Case Nos. 09-78585 (AST)  
09-78584 (AST)  
09-78589 (AST)  
09-78586 (AST)  
09-78587 (AST)  
09-78588 (AST)  
09-78590 (AST)

Debtors.

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**LOCAL RULE 9077-1 AFFIRMATION**

Matthew G. Roseman, under the penalties of perjury affirms as follows:

1. I am a partner in the firm of Cullen and Dykman LLP, proposed counsel to the Debtors and Debtors-in-Possession as such am fully familiar with the facts and circumstances herein.

2. I submit this affirmation of exigent circumstances in support of the Motion seeking an Order (i) authorizing the Debtors to receive and all contract vendees, including but not limited to the United Nations to pay to the Debtors all funds due the Debtors and (ii) granting related relief (the "Comfort Order Motion").

3. As set forth in the affidavit of Kazem Paksima, The United Nations currently owes the Debtors approximately \$3,800,000 for work, labor and services provided and now

due under various contracts.

4. The Procurement Office of the United Nations has refused to pay these amount due as they are uncertain that the Debtor is entitled to receive these funds. Without the issuance of the requested relief, the Debtor will be unable to meet its obligations as they become due.

5. Accordingly, it is respectfully requested that the Court enter the Scheduling Order submitted, scheduling an expedited hearing on this Motion. No previous application for similar relief has been made.

Dated: Garden City, New York  
March 9, 2010

CULLEN AND DYKMAN LLP  
Counsel to the Debtors

By



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